

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

JASON GALANIS,  
GARY HIRST,  
JOHN GALANIS, a/k/a “Yanni,”  
HUGH DUNKERLEY,  
MICHELLE MORTON,  
DEVON ARCHER, and  
BEVAN COONEY,

Defendants.

No. 16 Cr. 371 (RA)

**NOTICE OF MOTION FOR SEVERANCE**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, as well as the Declaration of Matthew L. Schwartz, the exhibits thereto, and the pleadings and other filings in this case, defendants Devon Archer and Bevan Cooney respectfully move this Court before the Honorable Ronnie Abrams, United States District Judge, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an order severing their trial from the trial of their remaining co-defendants pursuant to Federal Rule of Criminal Procedure 14 and the Sixth Amendment to the United States Constitution.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the deadlines set by the Court by order dated October 27, 2017 [ECF No. 264], the government’s opposition papers are due on February 5, 2018, and reply papers are due on February 12, 2018.

Dated: January 16, 2018  
New York, New York

Respectfully submitted,

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